

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

CASE NO: 15-36520-KLP  
CHAPTER 13

U.S. BANKRUPTCY COURT  
RICHMOND DIVISION

2016 MAR 14 AM 9:36

In re  
David G. Lambert  
Brenda L. Lambert

Debtor(s),

ANDREW J. HOLICK

NOTICE TO DISMISS OR RE-HEAR NOTICE OF MOTION TO EMPLOY SPECIAL  
COUNSEL

COMES NOW the creditor, Andrew J. Holick, and hereby serves its notice of Request to dismiss or re-hear the MOTION TO EMPLOYE SPECIAL COUNSEL, filed March 7, 2016.

This Creditor certifies that he was unaware of the hearing scheduled for March 9, 2016 until after it took place.

This Creditor further certifies that as of March 13, 2016, he has yet to receive the filing by mail, fax or phone from Debtors counsel, Jason M. Krumbein, Esq.

In review of Mr. Krumbein's certification of mailing, this Creditors name, nor address are mentioned anywhere.

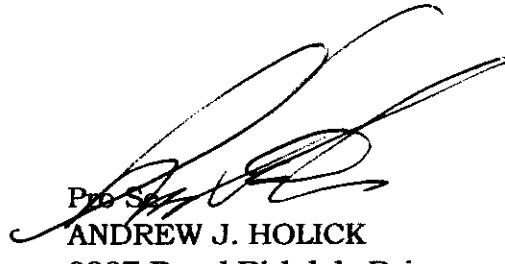
This Creditor denies number 8 in the motion based on the following: The Debtors, Brenda L. Lambert and David G. Lambert have filed several prior bankruptcies in the past years that have been both dismissed and discharged per 11 U.S.C. 362.

They are not entitled to an automatic stay for the life of this Chapter 13 filing. According to the document dated December 23, 2015 by William C. Redden, Clerk, US

Bankruptcy Court, the stay was limited to 30 days or may not exist at all.

The Garnishment was filed more than 60 days after the filing of this  
Bankruptcy.

WHEREFORE, this Creditor respectfully requests this honorable Court to dismiss this action until it is properly filed and served on the Creditors. If not, the Creditor asks that the Court schedule this matter to be re-heard at a date convenient for all parties. This Creditor further asks that this Court deny Number 8 as there is no violation of the automatic stay. Prior Counsel for the Debtors, Pia North did not request an extension of the stay. Also, to deny Number 10, due to the fact Mr. Krumbein has not attempted to resolve this issue and there is no violation of the automatic stay. Prior Counsel for the Debtors, Pia North, did not request and extension of the stay.

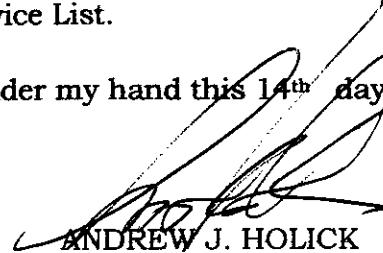


Pro Se  
ANDREW J. HOLICK  
8907 Royal Birkdale Drive  
Chesterfield, VA 23832  
(804) 350-5942

CERTIFICATE OF SERVICE

I CERTIFY that a copy has been furnished either by electronic or standard first class mail on March 14, 2016, to: David G. Lambert and Brenda L. Lambert, Debtor(s), 202 E. Brookland Park Blvd., Richmond, VA 23222; Jason M. Krumbein, Esq., Debtor(s) Attorney in Bankruptcy, Krumbein Consumer Legal Services, Inc. 1650 Willow Lawn Drive, Suite 201, Richmond, VA 23230; Suzanne E. Wade, Chapter 13 Trustee, PO Box 1780, Richmond, VA 23218-1780 Fax: (804) 775-0986 and all creditors listed on the attached Service List.

Given under my hand this 14<sup>th</sup> day of March, 2016

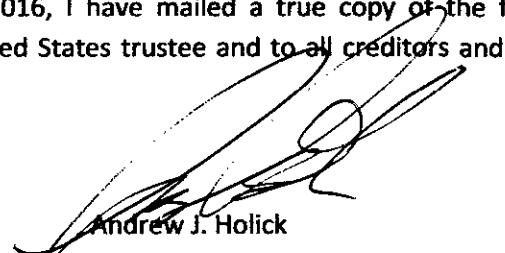
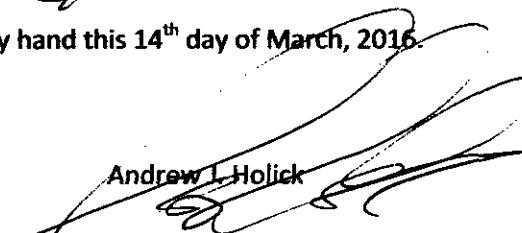
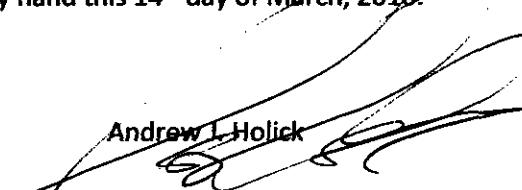


ANDREW J. HOLICK

Case No. 15-36520-KLP

CERTIFICATE OF SERVICE

I CERTIFY that on March 14, 2016, I have mailed a true copy of the foregoing documents by mail to the Debtor(s), Chapter 13 Trustee, the United States trustee and to all creditors and parties in interest of the mailing list attached hereto.

  
Andrew J. Holick  
Given under my hand this 14<sup>th</sup> day of March, 2016.  
Andrew J. Holick

David G. Lambert and  
Brenda L. Lambert  
202 E. Brookland Park Blvd.  
Richmond, VA 23222

Suzanne E. Wade  
Chapter 13 Trustee  
PO Box 1780  
Richmond, VA 23218-1780  
Fax: (804)775-0986

Alfa Vision Insurance Co  
PO Box 2328  
Brentwood, TN 37024-2328

Avid Acceptance  
PO Box 708580  
Sandy, UT 84070-8580

Avid Acceptance, LLC  
6995 Union Park Center  
Midvale, UT 84047-6047

CJW Medical Center  
Post Office Box 99008  
Bedford, TX 76095-9108

City Auto  
4000 Regent Blvd  
Irving, TX 75063-2246

City of Richmond DPU Bank  
Dept. of Public Utilities  
730 E. Broad Street, 5<sup>th</sup> Floor  
Richmond, VA 23219-1861

Comcast  
5401 Staples Mill Road  
Richmond, VA 23228-5443

Commonwealth Hospitalist Serv.  
4050 Innslake Dr.  
Suite 308  
Glen Allen, VA 23060-3327

Consumer Portfolio Svc.  
Attn: BANKRUPTCY  
19500 Jamboree Rd.  
Irvine, CA 92612-2401

Dominion Virginia Power  
PO Box 26543  
Richmond, VA 23290-0001

Focus Recovery Solutions  
Attn: Bankruptcy  
9701 Metropolitan Court, Suite B  
Richmond, VA 23236

Fast Auto Loan  
5218 West Broad St.  
Richmond, VA 23230-3010

First Credit Corporation  
PO Box 9300  
Boulder, CO 80301-9300

First Credit Corporation  
PO Box 9300  
Boulder, CO 80301-9300

Henrico County Treasurer PP  
PO Box 90775  
Henrico, VA 23273-0775

Ntelos  
PO Box 580423  
Charlotte, NC 28258-0423

Case No. 15-36520-KLP

Produce Source Partners 13167 Telecourt Rd Ashland, VA 23005-7454	Solomon & Solomon, PC 5 Columbia Circle Albany, NY 12203-6374	Jason M. Krumbein, Esq. Krumbein Consumer Legal Services, Inc. 1650 Willow Lawn Dr., Suite 201 Richmond, VA 23230
Chesterfield County Property Taxes Richard A. Cordle, Treasurer PO Box 26585 Richmond, VA 23261-6585	Commonwealth of VA – Tax PO Box 2156 Richmond, VA 23218-2156	Consumer Portfolio Svc. Attn: Bankruptcy PO Box 57071 Irvine, CA 92619-7071
Henrico Doctors Hospital PO Box 740760 Cincinnati, OH 45274-0760	HSBC Taxpayer Finance 90 Christiana Road New Castle, DE 19720-3118	IC Systems, Inc. PO Box 64378 St. Paul, MN 55164-0378
Internal Revenue Service Centralized Insolvency Unit PO Box 7346 Philadelphia, PA 19101-7346	Prestige Financial Svc Attn: Bankruptcy PO Box 26707 Salt Lake City, UT 84126-0707	Southwest Credit Systems 4120 International Parkway Suite 110 Carrollton, TX 75007-1958
Verizon Wireless PO Box 3397 Bloomington, IL 61702-3397	United States Bankruptcy Court Eastern District of Virginia 701 East Broad Street Richmond, VA 23219 Attn: Clerk of Court	

B20A (Official Form 20A) (Notice of Motion or Objection) (12/10)

EDVA (12/10)

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA

Division

In re: David G. Lambert )  
Brenda L. Lambert )

[Set forth here all names including married, maiden, and  
trade names used by debtor within last 8 years.] )

Debtor )

Address 202 E. Brookland Park Blvd )  
Richmond VA 23222 )

Last four digits of Social Security or Individual Tax-payer  
Identification (ITIN) No(s)., (if any): 4728 )

Employer's Tax Identification (EIN) No(s)., (if any): 0370 )

Case No. 3:15-BK-36520-KLP

Chapter 13

NOTICE OF MOTION (OR OBJECTION)

Andrew J Holick has filed papers with the court to Dismiss or  
Rehear Notice of Motion to Employ Social Counsel.

**Your rights may be affected.** You should read these papers carefully and discuss  
them with your attorney, if you have one in this bankruptcy case. (If you do not have an  
attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion (or objection), or if  
you want the court to consider your views on the motion (or objection), then on or before

14 Days From Today you or your attorney must:

File with the court, at the address shown below, a written request for a hearing  
[or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail  
your request for hearing (or response) to the court for filing, you must mail it  
early enough so the court will receive it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court

You must also mail a copy to:

Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing**

Attend the hearing on the motion (or objection) scheduled to be held on April 6, 2016 at 10:00 A m. at United States Bankruptcy Court, 701 E. 13th St. Before  
Judge Phillips room 5105, Richmond VA 23219

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: 3-14-2016

Signature, name, address and telephone number of person giving notice:

  
Andrew J. Hatch  
8907 Royal Brook dr.  
Custer Field, VA 23892  
Virginia State Bar No. \_\_\_\_\_  
Counsel for \_\_\_\_\_

Certificate of Service

I hereby certify that I have this 14th day of March, 2016, mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the parties listed on the attached service list.

